

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	STIPULATION AND ORDER
CORRECTIONS CORPORATION OF )	EXTENDING DEADLINE FOR
AMERICA, et al., )	EXCLUSION REQUESTS
Defendants. )	
_____ )	

WHEREAS, on October 29, 2020, Plaintiff<sup>1</sup> filed Lead Plaintiff's Unopposed Motion of Lead Plaintiff and Class Representative to Approve the Form and Manner of Class Notice and Notice Plan (ECF No. 329) ("Unopposed Motion");

WHEREAS, on October 30, 2020, the Court issued an Order Granting the Unopposed Motion (ECF No. 330) ("Order");

WHEREAS, pursuant to the Order, on December 21, 2020, the Court-approved Notice Administrator began mailing the Class Notice to all Class members who could be identified with reasonable effort;

WHEREAS, the Order provides that:

**7. Special Notice to Banks, Brokers and Other Nominees**

If you hold any CCA/CoreCivic securities that were purchased or acquired between February 27, 2012 and August 17, 2016, inclusive, as a nominee for a beneficial owner, then, within ten business days after you receive this Notice, you must either:

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<sup>1</sup> "Plaintiff" is Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund. "Defendants" are Corrections Corporation of America ("CCA" or the "Company") and "Individual Defendants" Damon T. Hininger, David M. Garfinkle, Todd Mullenger and Harley G. Lappin. Following the filing of this action, Defendants rebranded CCA and now refer to it as CoreCivic,

(1) send a copy of this Notice by First-Class Mail to all such Persons; or (2) provide a list of the names and addresses of such persons to the Notice Administrator . . . .

WHEREAS, last week the Notice Administrator received a request for over 100,000 Notices from a nominee;

WHEREAS, while the Notice Administrator intends to provide the nominee with the requested Notice, Plaintiff is concerned that, in light of the February 4, 2021, deadline for requests for exclusion from the Class, the Notice will not reach the potential Class members identified by the nominee in time to allow such potential Class members a meaningful opportunity to exclude themselves from this action; and

WHEREAS, Plaintiff believes extending the deadline for requests for exclusion until March 18, 2021 is reasonable under these circumstances in order to allow additional time for potential Class members to receive the Notice and have a meaningful opportunity to exclude themselves

NOW, THEREFORE, it is stipulated and agreed, by and between Plaintiff and Defendants, and subject to the approval of the Court, that:

1. The deadline to request exclusion shall be extended until March 18, 2021; and
2. The Notice Administrator shall update the Notice and the website dedicated to the litigation to reflect the revised deadline to request exclusion.

IT IS SO STIPULATED.

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DATED: January 28, 2021

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\* \* \*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

  
\_\_\_\_\_  
THE HONORABLE ALETA A. TRAUGER  
UNITED STATES DISTRICT JUDGE